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August 18, 2003

GENERAL COUNSEL-GEORGIA

AUG 1 0 2003

To: All Parties of Record

Investigation Into Development of Electronic Interfaces for BellSouth's

Re: <u>Investigation Into Development of Electronic Interfaces for BellS</u> Operations Support Systems; Docket No. 8354-U

<u>Performance Measurements for Telecommunications Interconnection,</u> Unbundling and Resale; Docket No. 7892-U

By letter dated October 30, 2000, the Commission directed KPMG Consulting, Inc. (now BearingPoint) to conduct an audit of "the Enforcement Plan metrics and payments ordered in Docket 7892-U as well as BellSouth's publication of the subsequent results." BearingPoint has been auditing the Self-Effectuating Enforcement Mechanisms ("SEEM") Plan adopted by this Commission for BellSouth in Georgia since that time.

Recently two issues have been brought to the Commission's attention concerning the SEEM audit. First, BellSouth is currently in the process of transitioning to an automated system remedy calculations for certain measures that previously had been handled manually. According to BellSouth, this transition should be completed later this summer. Until that time, however, the Commission believes that having BearingPoint audit manual measures that are in the process of being automated would serve little purpose, particularly when BearingPoint has indicated that it intends to test all of these manual measures once the transition process is completed, including those that have already been audited successfully.

Second, BellSouth is currently in the process of developing a SEEM Replication Manual (RDUM) to respond to an exception issued by BearingPoint during the audit. According to BellSouth, the SEEM RDUM should be available sometime in September 2003. The Commission finds that completion of the SEEM RDUM is required in order for meaningful testing to continue, particularly when BearingPoint has indicated that additional testing of the SEEM measures would be required to validate the completeness and accuracy of the manual.

Under the circumstances, the Commission directs BearingPoint to postpone further testing of the SEEM plan at this time. The Commission also directs BellSouth to file with this Commission its proposal for a "new and more focused audit plan" 30 days from the date of this letter. After which this Commission will assess both options and order BellSouth to either proceed with the new audit plan or continue with the SEEM audit plan currently in place.

Yours very truly,

Leon E. Bowles

Director, Telecommunications